

Investor Grievance Mechanism

1. BACKGROUND

Neuland Laboratories Limited (“the Company”) has its equity shares listed on both BSE Limited (BSE) and the National Stock Exchange of India Limited (NSE) (“Stock Exchanges”). The Company is committed to providing effective and timely services to its investors by maintaining strong relationships and ensuring consistent and reliable grievance redressal.

2. OBJECTIVE

This mechanism is designed to outline the company’s established mechanisms for receiving and addressing investor concerns, complaints, and grievances, with a strong focus on fair and prompt resolution. It aims to provide a clear framework for the timely and efficient handling of grievances, ensuring transparency and accountability throughout the process. Additionally, this mechanism affirms the right of investors to have accessible contact information, enabling them to easily raise inquiries or report grievances.

3. SCOPE

This mechanism applies to all investors of the Company, including individual and institutional investors.

4. INVESTOR CORRESPONDENCE

To ensure the effective handling of investor correspondence and grievances, the Company has a dedicated team, supported by personnel from M/s. KFin Technologies Limited, the Company’s Registrar & Share Transfer Agent (“RTA”).

The RTA and the Company manage various correspondence received from investors, which may come directly or be forwarded by the Stock Exchanges, Depositories, or submitted through SCORES (SEBI Complaints Redressal System). These communications pertain to Company’s securities, annual reports, dividends, and other related matters, and may include either complaints or inquiries/requests from investors or non-investors.

5. INVESTOR GRIEVANCE REDRESSAL MECHANISM

The Company has an established mechanism for managing investor correspondence and grievances. The RTA and the Secretarial Team serve as key points of contact in this process.

The following steps have been taken by the Company to address investor grievances and requests:

- a. RTA is principally responsible for managing the correspondence related to the security holders (viz. investors service requests/grievances) of the Company. The designated email address of RTA for the said purpose is inward.ris@kfintech.com.
- b. The Company has a designated email address ir@neulandlabs.com for assistance and redressal of the grievance(s) of the investors and is monitored by the officials of the Secretarial Department of the Company.
- c. If an investor request remains unresolved within the stipulated turnaround time, then the matter can be escalated to the designated officials of the Company, as mentioned in escalation matrix below.
- d. Reports are being obtained by the Company from the RTA in respect of correspondences & grievances, and the same is placed before the Stakeholders Relationship Committee of the Board of Directors of the Company from time to time.

The Stakeholders Relationship Committee reviews the effectiveness of the grievance redressal mechanism in place for handling complaints from investors.

- e. All the investor complaints/grievances, including the ones received through SCORES, Stock Exchanges viz. BSE Limited and National Stock Exchange of India Limited, Depositories viz. National Securities Depository Limited and Central Depository Services (India) Limited, any other regulatory authorities, etc. (hereinafter referred to as 'the regulatory authorities') shall be attended and resolved by the Company expeditiously.
- f. The statement of investor complaints, on a quarterly basis, is also placed before the Board of Directors of the Company.
- g. The Company also makes annual disclosure of the statement of investor complaints in its annual report pursuant to the requirements of the SEBI Listing Regulations.
- h. The Company obtains, annually, from the RTA, a report by their independent internal auditors on the RTA activities including the process of grievance handling. Further, the Company places the Internal Audit Report and action taken report on the observations, if any at the meeting of the Stakeholders Relationship Committee and the Board of Directors as required under applicable SEBI regulations.
- i. For continuous engagement and sharing regular updates with the investors, the Company conducts general meetings, investor meets and shares e-mails, letters, publishes public notices in widely circulated newspapers.

6. ESCALATION MATRIX FOR INVESTORS' GRIEVANCES

- a. Registrar and Share Transfer Agent:



Investors are requested to route their service requests/grievances first to the Company's RTA.

Following are the contact details of RTA:

KFin Technologies Limited
Selenium Tower B, Plot Nos. 31 & 32 | Financial District
Nanakramguda | Serilingampally Mandal | Hyderabad - 500032 | India
P: +91 40 6716 1767
Email: einward.ris@kfintech.com
Website: www.kfintech.com

b. Escalation Level 1 (Company):

Wherein the grievance(s) of the investors are not resolved within 7 working days of sending the email to RTA/the Company or within required timelines after delivery of all the requisite documents and information or wherein the investor is not satisfied with the resolution provided, he/she/they can refer the grievance(s) to the following executives of the Company at:

Mr. Rohit Konda

Legal & Secretarial
Neuland Laboratories Limited,
11th Floor (5th Level), Phoenix IVY Building,
Plot No. 573A-III, Road No. 82, Jubilee Hills,
Hyderabad, 500033, Telangana, India
E-mail: RohitKonda@neulandlabs.com

c. Escalation Level 2 (Company):

Wherein the grievance(s) of the investor is not resolved within the next 5 working days of sending the email to the above executive of the Company or where the investor is not satisfied with the resolution provided, he/she/they can refer the grievance(s) to the Company Secretary of the Company at:

Ms. Sarada Bhamidipati

Company Secretary & Compliance Officer
Neuland Laboratories Limited,
11th Floor (5th Level), Phoenix IVY Building,
Plot No. 573A-III, Road No. 82, Jubilee Hills,
Hyderabad, 500033, Telangana, India
E-mail: saradab@neulandlabs.com

d. SCORES Platform:

In case the grievance(s) of the investor(s) is still not resolved to the investor's satisfaction, the investor may approach the Securities and Exchange Board of India and file their grievance through "SCORES", the centralized online system for lodging and tracking complaints. Investors who wish to lodge a Complaint on SCORES are required to register themselves on www.scores.gov.in by clicking on "Register here" under the "Investor Corner". While filing the registration form, details like the Name of the investor, Permanent Account Number (PAN), contact details, and email id, are required to be provided for effective communication and speedy redressal of the grievances. Upon successful registration, a unique user id and a password shall be generated and communicated through an acknowledgment email to the complainant.

Investors are advised to refer to the relevant SEBI Circular to understand the SEBI prescribed framework for redressal of investor grievances.

e. Online Dispute Resolution Portal:

SEBI through its Master Circular on resolution of disputes has streamlined the dispute resolution mechanism in the Indian securities market under the aegis of Stock Exchanges and Depositories by expanding their scope and by establishing a common Online Dispute Resolution Portal ("ODR Portal") which harnesses online conciliation and online arbitration for resolution of disputes arising in the Indian Securities Market.

Accordingly, in cases where investors raise issues, that require adjudication on any third party rights, on questions of law or fact or which is in the nature of a law between parties, or if investors are not satisfied with outcome of complaints filed on SCORES platform post SEBI review, they can initiate dispute resolution through the ODR portal within the prescribed timeline.

Explanation:

- a. Investors can approach the Online Dispute Resolution mechanism or other appropriate civil remedies at any point of time. In case the complainant opts for Online Dispute Resolution mechanism or other appropriate civil remedies while the complaint is pending on SCORES, the complaint shall be treated as disposed on SCORES platform.
- b. The dispute resolution through the ODR portal can be initiated only if such complaint/dispute is not pending before any arbitral process, Court, Tribunal, or Consumer Forum or if the same is non-arbitrable under Indian law.

Investors are advised to refer the relevant SEBI Master Circular to understand the SEBI prescribed framework for online dispute redressal of investor grievances

f. Other Legal Recourse:

In addition, investors also have the option to approach legal forums including Civil Courts, Consumer Courts, etc.

CONTACT DETAILS OF NODAL OFFICER OF THE COMPANY

Nodal Officer: Ms. Sarada Bhamidipati

(For the refund of Unpaid and Unclaimed amounts entrusted by the Investor Education and Protection Fund ("IEPF") Authority)

Designation: Company Secretary & Compliance Officer

Tel: +91 40 6761 1600

Email: saradab@neulandlabs.com

INVESTOR RELATIONS CONTACT DETAILS

Mr. Diwakar Pingle

Head – Investor Relations Advisory | Partner – Strategy & Transactions

Ernst & Young LLP

Email: Diwakar.Pingle@in.ey.com

7. CLASSIFICATION OF INVESTOR COMMUNICATION

The Company receives various correspondence/ communication from the shareholders/ investors relating to the shares, annual reports, dividends and ancillary matters. These communications may either be complaints or mere queries/ requests by the investors. The Company presently follows a set of guidelines for classifying the investors' communication between general correspondence/ requests/ complaints, etc. These guidelines are internal to the Company.

A. Communication from investors to be treated as requests -

- i. correspondence w.r.t. change in address, nominees etc.
- ii. any communication/ suggestions/ enquiry about procedures
- iii. any communication requisitioning information or documents relating to the Company or its operations as per statutory rights available to the investors
- iv. non-receipt of annual reports, dividend, share certificates, letter of confirmation and IEPF related matters.
- v. communications/ complaints in relation to matters that are sub-judice

B. Communication from investors to be treated as complaints -

- i. If a request remains unresolved within the stipulated turnaround time and the matter is escalated to Level 2, as provided in the escalation matrix above, then the same will be treated as a complaint.

Escalating the matter to Level 2, as provided in the escalation matrix above, before completion of the stipulated turnaround time will not be treated as a complaint.

If an investor writes to the Company/RTA pertaining to his/her unwillingness to provide any document, or where the investor expresses his/her dissatisfaction over the rejection of a particular document or any other matter which is required either as per law or as per Company's Standard Operating Procedures, then the same will not be treated as a complaint.

- ii. Investor complaints received through statutory authorities.

Complaints received from regulatory bodies like SEBI, MCA, Stock Exchanges etc. shall be considered as complaints for reporting purpose.

Multiple correspondence or reminders received for the same matter within the stipulated turnaround time for handling the investor service request/grievance will be treated as one request/complaint.

In case of any ambiguity, the Company Secretary shall be the sole authority to decide on the nature and classification of the communication and the decision of the Company Secretary shall be final and binding.

8. MAINTENANCE OF RECORDS

Records of grievances shall be maintained by the RTA for such period as prescribed under relevant statute(s) and submit the same to the Company as and when sought by the Company.